

Exhibit 45

1
2 UNITED STATES DISTRICT COURT

3 DISTRICT OF NEW JERSEY

4 Civil Action No. 2:16-CV-06576

5 -----x

6 INDUSTRIA DE ALIMENTOS ZENU S.A.S.,

7 Plaintiff,

8 -against-

9 LATINFOOD U.S. CORP. d/b/a ZENU

10 PRODUCTS CO. and WILSON ZULUAGA,

11 Defendants/Counter Plaintiff.

12 -----x

13 LATINFOOD U.S. CORP. d/b/a ZENU

14 PRODUCTS CO.,

15 Defendant/Counter Plaintiff,

16 -against-

17 INDUSTRIA DE ALIMENTOS ZENU S.A.S.

18 and CORDIALSA USA, INC.

19 Counter Defendants.

20 -----x

21 DEPOSITION OF HERNANDO RAMOS MORENO

22 New York, New York

23 January 16, 2020

24 Reported By:

25 ERIC J. FINZ

1 HERNANDO RAMOS MORENO

2 Q. Do you know if there are 15:26:49
3 employees of Industria that also perform 15:27:11
4 work projects for Cordialsa? 15:27:13

5 A. I don't know. 15:27:26

6 Q. Are you familiar with -- do 15:27:32
7 you know if Industria has -- had dealings 15:27:40
8 with U.S. Customs? 15:27:46

9 MR. RAYMOND: At any time? 15:28:02

10 MR. INGBER: At any time. 15:28:08

11 A. Not directly. 15:28:15

12 Q. Has Industria had dealings 15:28:25
13 with U.S. Customs in conjunction with 15:28:27
14 Cordialsa at any time? 15:28:30

15 MR. RAYMOND: Objection. Can 15:28:35
16 you read back the question before 15:28:36
17 you translate it. 15:28:39

18 (Record read as requested.) 15:29:00

19 A. Yes. 15:29:00

20 BY MR. INGBER: 15:29:00

21 Q. In your position as director 15:29:00
22 of sales, did you make any efforts into 15:29:09
23 bringing Zenu and Ranchera branded 15:29:11
24 products to the United States? 15:29:16

25 A. Yes. 15:29:34

1 HERNANDO RAMOS MORENO

2 Q. As director of sales, have you 15:29:34
3 worked with the U.S. Food and Drug 15:29:36
4 Administration? 15:29:57

5 A. No. 15:29:57

6 Q. Do you know who Luis Alfonso 15:29:57
7 Arango is? 15:30:06

8 A. Yes. 15:30:08

9 Q. Who is he? 15:30:09

10 A. He's the manager of Cordialsa 15:30:10
11 USA. 15:30:25

12 Q. How long have you -- how long 15:30:25
13 have you known Mr. Arango? 15:30:27

14 A. Since 2010. 15:30:38

15 Q. Have you met with him before 15:30:40
16 in person? 15:30:44

17 A. Yes. 15:30:49

18 Q. How many times would you say 15:30:49
19 you've met with him? 15:30:51

20 A. One time. 15:31:00

21 Q. Was this in Colombia? 15:31:01

22 A. Yes. 15:31:05

23 Q. Was this in 2014? 15:31:06

24 A. Yes. 15:31:09

25 Q. How long was your meeting with 15:31:09

1 HERNANDO RAMOS MORENO

2 Mr. Arango? 15:31:20

3 A. I don't remember. 15:31:28

4 Q. Did you meet with him 15:31:29

5 one-on-one? 15:31:32

6 A. Yes. 15:31:39

7 Q. And what did you discuss? 15:31:39

8 A. To expand Cordialsa's sales 15:31:47

9 with Industria products. 15:32:02

10 Q. Where did you -- were you the 15:32:08

11 one that wanted to expand -- you as 15:32:12

12 director of sales, did you want to expand 15:32:15

13 into the United States? 15:32:19

14 A. Yes. 15:32:30

15 Q. Was this for Zenu products? 15:32:30

16 A. Yes. 15:32:38

17 Q. And how about Ranchera 15:32:39

18 products? 15:32:42

19 A. No. 15:32:43

20 Q. Was this with meat products? 15:32:43

21 A. Initially, no. 15:32:57

22 Q. When did it become meat 15:32:59

23 products? 15:33:05

24 MR. RAYMOND: Object to the 15:33:05

25 form of the question, no foundation 15:33:06

1 HERNANDO RAMOS MORENO

2 for that. 15:33:07

3 Q. Did it become meat products? 15:33:14

4 A. I don't understand the 15:33:23
5 question. 15:33:24

6 Q. You said you wanted to expand 15:33:24
7 into the United States on behalf of 15:33:27
8 Industria. 15:33:31

9 A. Yes. 15:33:38

10 Q. And you said that it was Zenu 15:33:39
11 brand products. Is that correct? 15:33:42

12 A. Yes. 15:33:47

13 Q. Did there come a point in time 15:33:47
14 where you wanted to expand Zenu brand 15:33:50
15 meat products into the U.S.? 15:33:53

16 A. Yes. 15:34:02

17 Q. Was this at the direction of 15:34:02
18 Diego Medina? 15:34:05

19 A. Yes. 15:34:09

20 Q. Did you have a plan for 15:34:11
21 getting -- excuse me. 15:34:22

22 How did you plan to get around 15:34:25
23 the hoof-and-mouth restriction that you 15:34:30
24 mentioned before? 15:34:33

25 A. We're trying to find a local 15:34:35

1 HERNANDO RAMOS MORENO

2 manufacturer. 15:34:52

3 Q. "Local" meaning in the United 15:34:54
4 States? 15:35:01

5 A. Yes. 15:35:01

6 Q. Doesn't Industria currently 15:35:04
7 export meat products from the U.S. to 15:35:10
8 Colombia? 15:35:14

9 A. Yes. 15:35:26

10 Q. So you already had a local 15:35:26
11 distributor in the U.S. Isn't that 15:35:28
12 correct? 15:35:30

13 MR. RAYMOND: Object to the 15:35:30
14 form of the question. 15:35:31

15 Q. Is that correct? 15:35:46

16 A. Can you repeat the question? 15:35:47

17 Q. You already had a local meat 15:35:51
18 manufacturer of product in the U.S. 15:35:55
19 Didn't you? 15:35:58

20 MR. RAYMOND: Object to the 15:35:59
21 form of the question. At what 15:36:06
22 point in time when you say he 15:36:08
23 already had? 15:36:09

24 Q. When you were trying to export 15:36:14
25 Zenu Ranchera meat products into the 15:36:19

1 HERNANDO RAMOS MORENO

2 U.S., which I believe was at around 2014? 15:36:24

3 MR. RAYMOND: I'm going to 15:36:37

4 object to that in that he said it 15:36:38

5 was Zenu and not Ranchera. 15:36:40

6 MR. INGBER: I'm sorry, yes. 15:36:44

7 Zenu. 15:36:46

8 A. Yes. 15:36:48

9 Q. Again, when did you first -- 15:36:56

10 when did Industria first try to export 15:37:02

11 Zenu meat products into the U.S.? 15:37:07

12 MR. RAYMOND: Again, I'm going 15:37:25

13 to object to the form. There has 15:37:26

14 been no testimony that they ever 15:37:27

15 did try to export meat products to 15:37:29

16 the U.S. 15:37:31

17 But you can answer the 15:37:33

18 question if you can. 15:37:39

19 A. They were not meat products. 15:37:44

20 Q. I believe you testified 15:37:50

21 earlier that Zenu -- excuse me. That 15:37:51

22 Industria exports meat products from the 15:37:56

23 United States to Colombia. 15:37:59

24 A. Yes. 15:38:09

25 Q. So isn't it true that 15:38:11

1 HERNANDO RAMOS MORENO

2 Industria had access to meat in the U.S. 15:38:13

3 locally? 15:38:19

4 MR. RAYMOND: Object to the 15:38:23

5 form. At what time are you asking 15:38:29

6 him? 15:38:31

7 MR. INGBER: We are talking 15:38:32

8 about a specific time. We're 15:38:34

9 talking about 2014. That's what 15:38:35

10 we're talking about. 15:38:37

11 MR. RAYMOND: You asked him 15:38:38

12 whether they export meat products 15:38:39

13 now. And then you're assuming that 15:38:40

14 that meant that they did it, you 15:38:42

15 know, five years ago. 15:38:44

16 I'm just asking you to clarify 15:38:45

17 so he understands what you're 15:38:46

18 asking him. If it's 2014, then 15:38:47

19 just ask him if he did it -- if 15:38:51

20 they did it in 2014. It's pretty 15:38:53

21 simple. It's a confusing question 15:38:56

22 when you tie together the present 15:38:59

23 with a period five years ago 15:39:00

24 without specifying it. 15:39:02

25 MR. INGBER: I'm going to 15:39:04

1	HERNANDO RAMOS MORENO	
2	rephrase.	15:39:05
3	BY MR. INGBER:	15:39:06
4	Q. When did -- do you know when	15:39:06
5	Industria first started exporting meat	15:39:09
6	products from the U.S. to Colombia?	15:39:11
7	A. I don't remember.	15:39:24
8	Q. Had Industria been exporting	15:39:25
9	meat products from the U.S. to Colombia	15:39:29
10	in 2011?	15:39:33
11	A. No.	15:39:48
12	Q. Again, when did it begin?	15:39:48
13	MR. RAYMOND: He just said he	15:39:55
14	didn't know.	15:39:56
15	Q. Had Industria been exporting	15:40:17
16	meat products from the United States to	15:40:20
17	Colombia in 2014?	15:40:24
18	A. I don't remember.	15:40:36
19	Q. Had Industria been exporting	15:40:37
20	meat products from the United States into	15:40:47
21	Colombia in the last two years?	15:40:51
22	A. Yes.	15:40:58
23	Q. How about in the last five	15:40:59
24	years?	15:41:01
25	A. I don't remember.	15:41:05

1 HERNANDO RAMOS MORENO

2 Q. You remember two years but not 15:41:06
3 five years. Is that correct? 15:41:10

4 A. Yes. 15:41:13

5 Q. What date did you meet with 15:41:14
6 Mr. Arango? 15:41:39

7 A. 2014. 15:41:45

8 Q. Do you remember the month? 15:41:47

9 A. March. 15:42:00

10 Q. What was the reason for you 15:42:00
11 meeting again with Mr. Arango? 15:42:02

12 MR. RAYMOND: It's been asked 15:42:05
13 and answered. 15:42:07

14 But you can answer it again. 15:42:07

15 A. To be able to expand 15:42:18
16 Cordialsa's sales with the Industria 15:42:28
17 portfolio in the United States. 15:42:30

18 MR. INGBER: Could we have 15:42:48
19 this marked as HRM-B. 15:42:50

20 (Exhibit HRM-B for 15:42:50
21 identification, email dated 15:42:50
22 September 19, 2017, production 15:42:50
23 numbers IAZ_DNJ 2488 through 15:42:50
24 IAZ_DNJ 2491.) 15:43:30

25 MR. RAYMOND: Again, for the 15:43:30

1 HERNANDO RAMOS MORENO

2 record, HRM-B appears to be a 15:43:31

3 document that's only in English. 15:43:34

4 So you may have to translate what 15:43:36

5 you want to ask him about. 15:43:37

6 BY MR. INGBER: 15:43:50

7 Q. By the way, have you ever -- 15:43:51

8 these are documents that were produced by 15:43:53

9 your counsel labeled IAZ_DNJ 2488 through 15:43:55

10 2491. 15:44:01

11 A. Okay. 15:44:09

12 MR. INGBER: I'm going to ask 15:44:23

13 the translator to refer to 2480. 15:44:24

14 And if you could read out the first 15:44:28

15 email from Hernando Ramos Moreno to 15:44:32

16 Fernery Garcia, cc Santiago Jimenez 15:44:41

17 Ramirez, regarding meeting with 15:44:46

18 Luis Alfonso Arango, Cordialsa USA. 15:44:50

19 MR. RAYMOND: There is no 15:44:54

20 2480. Do you mean 2490? 15:44:56

21 MR. INGBER: 2490. I'm sorry. 15:44:58

22 THE INTERPRETER: The second 15:45:02

23 to last page? 15:45:03

24 MR. INGBER: Yes. 15:45:04

25 THE INTERPRETER: The 15:45:05

1 HERNANDO RAMOS MORENO

2 highlighted portion? Do you want 15:45:06

3 just the highlighted portion? 15:45:07

4 MR. INGBER: If you can read 15:45:17

5 the whole thing. If you would give 15:45:18

6 him the information about dates and 15:45:25

7 who it's from. 15:45:27

8 (Interpreter complies.) 15:45:30

9 BY MR. INGBER: 15:49:04

10 Q. Is this email dated March 5, 15:49:04

11 2014? 15:49:06

12 A. Yes. 15:49:14

13 Q. Why did you draft this email? 15:49:14

14 A. After the meeting with Luis 15:49:40

15 Alfonso Arango I was trying to find some 15:49:42

16 tasks so we could work on exporting to 15:49:46

17 the United States. 15:49:48

18 Q. Who is Fernery Garcia? 15:49:50

19 A. My boss at that time. 15:49:58

20 Q. Did Santiago Jimenez have a 15:50:06

21 role in this project? 15:50:11

22 A. Yes. 15:50:17

23 Q. What was his role? 15:50:17

24 THE INTERPRETER: I just want 15:50:32

25 to look a word up to make sure. 15:50:33

1 HERNANDO RAMOS MORENO

2 A. He was the manager of the 15:50:36
3 supply chain. 15:50:38

4 Q. Did the meeting -- you 15:50:40
5 reference a meeting with Luis Arango. 15:50:45
6 Was the meeting on that same day of March 15:50:49
7 5, 2014? 15:50:51

8 A. No. 15:51:00

9 Q. Was it the day before? 15:51:00

10 A. Yes. 15:51:04

11 Q. So was there -- do you know if 15:51:06
12 there was -- why was the -- why was the 15:51:15
13 project to export beans suspended? 15:51:18

14 A. It was not being suspended. 15:51:31

15 MR. INGBER: Read him back the 15:51:41
16 first bullet point. 15:51:42

17 (Interpreter complies.) 15:51:45

18 A. Oh, it had been. This is in 15:51:54
19 the past. 15:51:55

20 Q. When had it been suspended, to 15:51:56
21 your knowledge? 15:52:02

22 A. 2011. 15:52:02

23 Q. Do you know if the suspension 15:52:08
24 had been lifted? 15:52:11

25 A. Yes. 15:52:17

1 HERNANDO RAMOS MORENO

2 Q. So the suspension was no 15:52:17
3 longer in place. Is that what you're 15:52:20
4 saying? 15:52:22

5 A. No. 15:52:27

6 Q. No, it was lifted? 15:52:30

7 A. Yes. 15:52:37

8 Q. Do you know why the suspension 15:53:03
9 was lifted? 15:53:06

10 A. Because Cordialsa was a larger 15:53:13
11 company and they had a better capacity 15:53:22
12 for distribution. 15:53:24

13 Q. Well, that doesn't answer -- 15:53:27
14 that doesn't appear to answer the 15:53:29
15 question about why the suspension was 15:53:31
16 lifted. 15:53:33

17 MR. RAYMOND: I object to the 15:53:34
18 comment. And there is no question 15:53:35
19 yet. 15:53:37

20 Q. Does it? 15:53:40

21 MR. RAYMOND: Does? I object 15:53:44
22 to the form. Does what? 15:53:46

23 Q. Your answer doesn't appear to 15:53:48
24 answer the question about why the 15:53:50
25 suspension is lifted. To me. It doesn't 15:53:52

1 HERNANDO RAMOS MORENO

2 appear. 15:53:55

3 MR. RAYMOND: I object to the 15:53:57

4 comment. It makes sense to me. 15:53:58

5 MR. INGBER: Good for you. 15:53:59

6 MR. RAYMOND: Well, good. He 15:54:00

7 answered the question. So that's 15:54:02

8 the answer. 15:54:03

9 There is no question. 15:54:19

10 Q. When did the suspension that 15:54:21

11 you referenced before in this letter, 15:54:23

12 when was it lifted? 15:54:27

13 A. I don't remember. 15:54:39

14 Q. Was the suspension lifted at 15:54:42

15 the time of this March 10, 2014 email 15:54:46

16 that you wrote? 15:54:51

17 A. Not necessarily. 15:55:03

18 Q. Do you know if Latinfood had a 15:55:09

19 trademark registration in the name of 15:55:12

20 Zenu at this time, in the U.S.? 15:55:14

21 A. No. 15:55:24

22 Q. Do you know if the suspension 15:55:25

23 that you reference here had anything to 15:55:27

24 do with Latinfood having a Zenu 15:55:28

25 registration in the U.S.? 15:55:33

1	HERNANDO RAMOS MORENO	
2	A. No.	15:55:48
3	(Exhibit HRM-C for	15:56:08
4	identification, letter dated	15:56:08
5	January 12, 2011, production	15:56:08
6	numbers IAZ_DNJ 3606 through	15:56:08
7	IAZ_DNJ 3609.)	15:56:17
8	MR. INGBER: We're going to	15:56:17
9	have this marked as HRM-C.	15:56:18
10	BY MR. INGBER:	15:56:52
11	Q. Have you ever seen this letter	15:57:08
12	before?	15:57:09
13	A. Yes.	15:57:14
14	Q. What do you understand this	15:57:15
15	letter -- do you know this is a letter	15:57:19
16	dated January 12, 2011 from U.S. Customs	15:57:20
17	and Border Protection to an Ernesto	15:57:27
18	Jocson?	15:57:31
19	A. Yes.	15:57:47
20	Q. Did you first see this letter	15:57:48
21	when it was -- around the time it was	15:57:49
22	written in January of 2011?	15:57:52
23	A. Yes.	15:58:05
24	Q. When did you see this letter	15:58:07
25	most recently?	15:58:10

1 HERNANDO RAMOS MORENO

2 the Tariff Act. It says that, quote, 16:00:26

3 "Provides, in general, that all articles 16:00:36

4 of foreign origin imported into the U.S. 16:00:39

5 must be legibly, conspicuously and 16:00:42

6 permanently marked to indicate the 16:00:46

7 English name of the country of origin to 16:00:49

8 an ultimate purchaser in the U.S." 16:00:51

9 It goes on to say, quote, "The 16:01:21

10 samples you submitted do not appear to be 16:01:25

11 properly marked with the country of 16:01:28

12 origin. You may wish to discuss the 16:01:29

13 matter of country of origin marking with 16:01:29

14 the Customs import specialist at the 16:01:32

15 proposed port of entry." 16:01:34

16 Did this letter have anything 16:01:58

17 to do with Industria's trying to import 16:02:01

18 Zenu-branded products into the U.S.? 16:02:07

19 A. Yes. 16:02:22

20 Q. Do you know if this had 16:02:25

21 anything to do with the suspension that 16:02:27

22 you referenced in your email dated March 16:02:30

23 10 -- March 5, 2014, to Fernery Garcia? 16:02:41

24 A. Yes. 16:03:04

25 Q. So more than three years had 16:03:05

1 HERNANDO RAMOS MORENO

2 passed since this January 12, 2011 16:03:11

3 Customs letter, and your email dated 16:03:15

4 March 5, 2014. Isn't that correct? 16:03:21

5 A. Yes. 16:03:42

6 Q. Would you say that this was a 16:03:42

7 labeling issue? 16:03:46

8 MR. RAYMOND: Object to the 16:03:50

9 form of the question. That what 16:03:51

10 was a labeling issue? 16:03:56

11 Q. Was this Customs letter 16:03:59

12 related to a labeling issue that you 16:04:01

13 were -- that Industria was dealing with? 16:04:04

14 A. Yes. 16:04:13

15 Q. Do you know why it took three 16:04:14

16 plus years for Industria to address this 16:04:26

17 issue of labeling? 16:04:32

18 A. I don't remember. 16:04:38

19 Q. So is it -- isn't it accurate 16:04:58

20 that three years passed and Industria 16:05:02

21 still hadn't fixed the problems about 16:05:03

22 labeling to enable their products to get 16:05:06

23 into the U.S.? 16:05:09

24 MR. RAYMOND: I object to the 16:05:22

25 form of the question. There is no 16:05:23

1 HERNANDO RAMOS MORENO

2 foundation for various assumptions 16:05:25

3 contained in that question. 16:05:27

4 But you can answer. 16:05:30

5 Q. You can answer the question. 16:05:37

6 A. It was not just the label. 16:05:38

7 Q. It was other issues? What 16:05:44

8 other issues? 16:05:46

9 A. The Cordialsa distribution 16:05:53
10 model was very small. 16:05:57

11 Q. Did it also have to do with 16:06:05
12 the technical specification sheet in 16:06:10
13 English which needed to be presented to 16:06:14
14 the FDA that you mention in your March 5, 16:06:15
15 2014 letter -- email? 16:06:18

16 MR. RAYMOND: Object to the 16:06:21
17 form. 16:06:23

18 You can answer. 16:06:23

19 A. Yes. 16:06:40

20 Q. Do you know if there were any 16:06:43
21 sanitary problems as well that was 16:06:44
22 preventing Industria from bringing its 16:06:48
23 goods into the -- its Zenu goods into the 16:06:54
24 U.S.? 16:07:02

25 A. No. 16:07:11

1 HERNANDO RAMOS MORENO

2 Q. This labeling issue, do you 16:07:19

3 know if Industria ever fixed this issue? 16:07:26

4 A. Yes. 16:07:37

5 Q. And do you know when that was 16:07:37

6 fixed? 16:07:40

7 A. I don't remember. 16:07:46

8 Q. Did this issue have anything 16:07:50

9 to do with Latinfood, by any chance? 16:07:52

10 A. I don't remember. 16:08:06

11 Q. Now, looking at HRM-B, Bates 16:09:18

12 number IAZ_DNJ 2489. There is an email 16:09:28

13 dated -- a subsequent email dated March 16:09:47

14 10, 2014, from Mr. Moreno to Carlos 16:09:50

15 Escobar, Santiago Jimenez, Juliana Gomez 16:10:03

16 Gonzalez. And this is, again, regarding 16:10:10

17 the meeting with Luis Alfonso Arango, 16:10:14

18 Cordialsa USA. 16:10:23

19 A. Okay. 16:10:41

20 Q. It says, "Good morning, 16:10:42

21 Carlos. Through the instruction of Diego 16:10:45

22 Medina, we had a meeting last week with 16:10:49

23 Luis Alfonso Arango, manager of Cordialsa 16:10:51

24 USA, who is interested in selling Zenu 16:10:56

25 antioquenos beans times 380 and 580 grams 16:11:03

1 HERNANDO RAMOS MORENO

2 to a nostalgic market of Colombians in 16:11:03
3 some geographic areas such as Florida, 16:11:06
4 New York and California." 16:11:09

5 So did Mr. Medina ever discuss 16:11:39
6 the reasons with you why he wanted to 16:11:45
7 bring Industria's Zenu-branded products 16:11:49
8 to the U.S.? 16:11:55

9 A. Not directly. 16:12:05

10 Q. How did you -- you say here 16:12:07
11 "through the instruction of Diego Medina" 16:12:13
12 you had a meeting last week with 16:12:17
13 Mr. Arango. 16:12:18

14 How did Mr. Medina convey this 16:12:20
15 instruction? 16:12:22

16 A. Through my direct boss. 16:12:38

17 Q. And who was that again? 16:12:41

18 A. He's in the email, Fernery 16:12:45
19 Garcia. 16:12:53

20 Q. Do you know what the purpose 16:13:02
21 of this email was for? 16:13:03

22 A. To begin the project of 16:13:15
23 exporting their products into the United 16:13:20
24 States. 16:13:23

25 Q. Were you in charge of this 16:13:23

1 HERNANDO RAMOS MORENO

2 project on behalf of Industria? 16:13:25

3 A. Yes. 16:13:33

4 Q. Who were the people that 16:13:34

5 you've worked with at Industria or 16:13:54

6 Cordialsa about bringing Industria's 16:13:58

7 branded Zenu products into the U.S.? 16:14:03

8 MR. RAYMOND: Object to the 16:14:12

9 form. To clarify, do you want the 16:14:13

10 names of the people from both 16:14:15

11 companies or just one or the other. 16:14:16

12 You said or. 16:14:18

13 MR. INGBER: I said both. 16:14:19

14 MR. RAYMOND: You said or. 16:14:20

15 MR. INGBER: Industria and 16:14:22

16 Cordialsa. 16:14:29

17 A. Okay. From marketing, Luis 16:14:32

18 Ignacio Salazar. The supply chain, 16:14:41

19 Santiago Jimenez. And Luis Alfonso 16:14:47

20 Arango from Cordialsa USA. 16:14:56

21 Q. Have you ever travelled to the 16:14:59

22 United States before? 16:15:01

23 A. Regarding this matter or 16:15:15

24 personal? 16:15:16

25 Q. Well, first, have you ever 16:15:17

1	HERNANDO RAMOS MORENO	
2	travelled to the U.S. before?	16:15:18
3	A. Yes.	16:15:24
4	Q. How many times?	16:15:24
5	A. Four or five times.	16:15:28
6	Q. Have you ever travelled to the	16:15:34
7	U.S. on official business for Industria?	16:15:35
8	A. Yes, fairs.	16:15:44
9	Q. What kind of fairs?	16:15:53
10	A. Food fairs.	16:15:58
11	Q. When did you travel to the	16:16:02
12	U.S. to attend a food fair, what year?	16:16:03
13	A. 2007. And 2016. I don't	16:16:20
14	remember exactly.	16:16:27
15	Q. Was this a food fair in the	16:16:28
16	U.S. in 2007 and 2016?	16:16:33
17	A. Yes.	16:16:39
18	Q. Where was the 2007 food fair	16:16:43
19	that you attended?	16:16:53
20	A. Chicago.	16:17:00
21	Q. How about the one in 2016?	16:17:01
22	A. Chicago.	16:17:04
23	Q. Was Industria an exhibitor at	16:17:07
24	either of these food fairs?	16:17:12
25	A. No.	16:17:18

1 HERNANDO RAMOS MORENO

2 Q. Did you -- have you ever seen 16:17:24
3 any Zenu-branded products owned by 16:17:27
4 anybody in the U.S. in any of your 16:17:32
5 visits? 16:17:34

6 A. No. 16:17:45

7 Q. When you came to the United 16:17:47
8 States on business, did it have anything 16:17:55
9 to do with Industria trying to bring -- 16:17:57
10 trying to establish Zenu in the U.S.? 16:18:04

11 A. Me directly, no. 16:18:29

12 MR. RAYMOND: Can we take a 16:18:35
13 bathroom break, five minutes? 16:18:36

14 MR. INGBER: Sure. 16:18:38

15 (A recess was taken.) 16:18:39

16 MR. INGBER: Back on the 16:37:24
17 record. 16:37:25

18 BY MR. INGBER: 16:37:26

19 Q. You testified earlier that the 16:37:26
20 Cordialsa distribution model was very 16:37:29
21 small. What did you mean by that? 16:37:31

22 A. That it was a growing company 16:38:00
23 and when we started the project with them 16:38:02
24 initially, they did not have the right 16:38:07
25 distribution model to increase our sales. 16:38:10

1 HERNANDO RAMOS MORENO

2 Q. That had nothing to do with 16:38:13

3 Latinfood; did it? 16:38:22

4 MR. RAYMOND: Object to the 16:38:27

5 form. 16:38:27

6 You can answer. 16:38:29

7 A. Let's say that Cordialsa's 16:38:44

8 distribution model has nothing to do with 16:38:47

9 Latinfood. 16:38:48

10 Q. Do you know a company named 16:38:50

11 Marquillas? 16:39:00

12 A. No. 16:39:01

13 Q. Do you know anybody named 16:39:01

14 Felipe Munera? 16:39:04

15 A. No. 16:39:13

16 Q. Now, going back to HRM-B. On 16:39:20

17 IAZ_DNJ 2489 -- actually it begins on 16:39:40

18 2488 at the bottom. There is a reference 16:39:48

19 email from Juliana Gomez Gonzalez for 16:39:55

20 you, dated March 11, 2014, I believe. 16:40:08

21 And it relates to a meeting, again, with 16:40:16

22 Luis Alfonso Arango of Cordialsa. 16:40:19

23 Who is Juliana Gomez Gonzalez? 16:40:31

24 A. Director of marketing. She 16:40:43

25 works with Luis Ignacio Salazar. 16:40:45

1 HERNANDO RAMOS MORENO

2 Q. And who is Maria Adelaida 16:40:48
3 Arango Hoyos? 16:40:52

4 A. Marketing director, works with 16:40:58
5 Luis Ignacio Salazar. Correcting myself, 16:41:02
6 used to work. 16:41:08

7 Q. Do you know if Maria Arango is 16:41:09
8 related to Luis Arango? 16:41:13

9 A. I don't know. 16:41:25

10 Q. So she's writing to you and 16:41:30
11 she says, "hey, I have several doubts 16:41:34
12 that I would like to know in case of 16:41:37
13 requesting support from marketing." 16:41:40

14 Then she says, "do you have 16:41:52
15 the product value chain? What is the PVP 16:41:54
16 to the consumer in the U.S.A.? What are 16:41:57
17 the prices of the competitors? How much 16:42:08
18 is the product currently selling for? In 16:42:11
19 some cases we have seen that our products 16:42:15
20 are arriving but we do not carry them. 16:42:18
21 How big is the potential of the Colombian 16:42:33
22 population in the United States being 16:42:37
23 calculated?" Then it says, "The use of 16:42:40
24 the brand in the United States, if I 16:42:53
25 remember correctly, has been lost at some 16:42:55

1 HERNANDO RAMOS MORENO

2 Q. Yes. 17:07:35

3 A. It wasn't a concern, it was 17:07:52

4 more about the way the label should look. 17:07:54

5 We wanted to know if the writing should 17:07:56

6 be Spanish/English or English/Spanish. 17:07:58

7 Q. Did Mr. Arango respond to you? 17:09:01

8 A. Yes. 17:09:05

9 Q. And do you remember what his 17:09:09
10 response was? 17:09:10

11 A. It's here on the document. 17:09:17

12 Q. Can you -- is that what's on 17:09:20
13 3613, the first page? 17:09:24

14 A. Correct. 17:09:30

15 Q. What is he saying here? In 17:09:31
16 your own words, what is he saying? 17:09:36

17 A. That the name of the product 17:09:57

18 in English is fine. The nutritional 17:10:13

19 facts in English are fine. The 17:10:16

20 ingredients in English are fine. Then it 17:10:18

21 says that the law requires that the 17:10:40

22 product be in English and Spanish. And 17:10:41

23 that the way that we had defined the 17:10:43

24 labels was fine. 17:10:47

25 Should I continue? 17:10:54

1 HERNANDO RAMOS MORENO

2 Q. Yes. 17:10:55

3 A. That the product must read 17:11:08
4 distributed by Cordialsa and must have 17:11:10
5 their address in Houston. And then at 17:11:12
6 the end he says that it needs to have a 17:11:39
7 code that we use in Colombia that's an 17:11:44
8 EAN. It's a code that they do not use 17:11:47
9 here in the U.S., in the U.S. they use a 17:11:50
10 code called UPC, it's a twelve-digit 17:11:53
11 code. 17:11:57

12 Q. Are you familiar with UPC 17:11:57
13 codes? 17:11:59

14 A. No. 17:12:03

15 Q. I believe you testified 17:12:05
16 earlier that the Cordialsa back in 2014 17:12:09
17 didn't have the distribution capability 17:12:16
18 that Industria was looking for? 17:12:20

19 MR. RAYMOND: Object to the 17:12:23
20 form. 17:12:24

21 Q. Is that correct? 17:12:24

22 MR. RAYMOND: Object to the 17:12:25
23 form. That's not what he testified 17:12:26
24 to. 17:12:27

25 Did you say objection to the 17:12:53

1 HERNANDO RAMOS MORENO

2 form? That's not what he testified 17:12:55

3 to. 17:12:56

4 A. Okay. When we had started the 17:13:22

5 project, Cordialsa did not have the 17:13:24

6 distribution network, it wasn't big 17:13:26

7 enough. But in 2014 it had already 17:13:28

8 grown, they had more clients and they had 17:13:30

9 more potential for sales. So that's when 17:13:32

10 we began the project again with them. 17:13:34

11 MR. INGBER: I'd like to mark 17:13:42

12 this as Exhibit HRM-F. IAZ 2480 to 17:13:43

13 2481. 17:13:53

14 (Exhibit HRM-F for 17:13:57

15 identification, email dated 17:13:57

16 September 19, 2017, production 17:13:57

17 numbers IAZ_DNJ 2480 through 17:13:57

18 IAZ_DNJ 2481.) 17:14:21

19 BY MR. INGBER: 17:14:21

20 Q. So if you look at the bottom 17:14:22

21 of 2481, there is an email dated it looks 17:14:23

22 like, I guess it looks like September 17:14:31

23 11th, from Luis Arango to you. And he 17:14:32

24 says, "I'm visiting the points of sale 17:14:41

25 here in New Jersey. I'm finding that in 17:14:43

1 HERNANDO RAMOS MORENO

2 the market there are Zenu beans from a 17:14:45
3 company that calls itself Zenu Products 17:14:48
4 USA." 17:14:52

5 MR. RAYMOND: Before you get 17:15:02
6 the question, can I just clarify. 17:15:03
7 This seems to be March 12th, you 17:15:05
8 said September 11th. 17:15:07

9 MR. INGBER: I see September 17:15:09
10 10, 2481, at the bottom. 17:15:10

11 MR. RAYMOND: I'm sorry. 17:15:15

12 And I think 9/11 means 17:15:43
13 November 9, not September 11th. 17:15:45

14 MR. INGBER: November 10th -- 17:15:47
15 excuse me. September 10th. 17:15:49

16 MR. RAYMOND: I think it goes 17:15:51
17 day -- 17:15:54

18 MR. INGBER: This is September 17:15:56
19 10th, I believe. 17:15:57

20 Q. Is this dated September 10, 17:15:58
21 2014? 17:16:00

22 A. Yes. 17:16:09

23 Q. Now, above it there is a 17:16:15
24 response letter, response email, 17:16:17
25 September 11th, from you to Luis Arango, 17:16:20

1 HERNANDO RAMOS MORENO

2 regarding Zenu beans in the U.S.A. And 17:16:25
3 it says, "Luis, thank you very much for 17:16:43
4 the information, it coincides with the 17:16:46
5 teleclient that we sent to the legal 17:16:49
6 department, Juridica, where a client in 17:16:50
7 New York complained about the service of 17:16:54
8 our distributor in Miami, which we do not 17:16:56
9 have. This topic is more complex than we 17:16:59
10 had imagined." 17:17:04

11 And then there is an email on 17:17:40
12 2481 -- excuse me. 2480, first page, 17:17:45
13 it's from Luis Arango to you, dated, I 17:17:52
14 think it's March 12, 2014. Again, Zenu 17:17:58
15 beans in U.S.A. and also Rica Rondo. It 17:18:06
16 says, "Hey Hernando, I want to tell you 17:18:25
17 that the topic of Zenu has increased a 17:18:28
18 lot and our sales personnel are seeing 17:18:31
19 the product in many supermarkets and not 17:18:32
20 just the line of beans, but also all the 17:18:35
21 topic of sausages. In addition to the 17:18:38
22 Zenu brand we are seeing that they are 17:18:40
23 not -- that not they are also using Rica 17:18:42
24 Rondo. I'm going to send photos for your 17:18:49
25 record. In this email I'm sending photos 17:18:52

1 HERNANDO RAMOS MORENO

2 Do you know if Industria was 17:44:36
3 able -- who is Alimentos Carnicos, that's 17:44:38
4 your company, correct? 17:44:42

5 A. Yes. 17:44:44

6 Q. Did this product have meat in 17:44:50
7 it? 17:44:53

8 A. Bacon. A small amount. 17:45:03

9 Q. How would you be able to 17:45:05
10 overcome the U.S. restriction on -- 17:45:08
11 because of the hoof-and-mouth issue that 17:45:15
12 you referenced before? 17:45:17

13 MR. RAYMOND: Object to the 17:45:17
14 form. There is no testimony 17:45:19
15 hoof-and-mouth had anything to do 17:45:21
16 with bacon, which comes from a pig. 17:45:22

17 Q. Was there a hoof-and-mouth 17:45:25
18 restriction -- to your knowledge, was 17:45:27
19 there a hoof-and-mouth restriction that 17:45:28
20 Colombia had relating to bacon? 17:45:31

21 A. No. The restriction is for 17:45:45
22 cow meat. This is pork. 17:45:48

23 Q. Does Industria produce bacon 17:45:56
24 for export -- excuse me. Does Nutresa 17:46:03
25 produce bacon for export to the U.S., to 17:46:08

1 | HERNANDO RAMOS MORENO

2 | your knowledge? 17:46:17

3	A. Nutresa does not produce the	17:46:17
4	bacon. The bacon is produced by a	17:46:24
5	company in the United States.	17:46:26

6	Q. So again, is it still your	17:46:29
7	answer then that Colombian companies can	17:46:35
8	export bacon that is made in Colombia to	17:46:40
9	the United States?	17:46:47

10	A. In general, I do not have that	17:47:19
11	information. But the amount -- the	17:47:21
12	percentage of the bacon in this item was	17:47:24
13	very low. The main ingredient was beans,	17:47:26
14	not bacon.	17:47:29

15	Q. So are you saying that you're	17:47:34
16	not sure now whether Colombia could	17:47:37
17	export pork products that are made in	17:47:40
18	Colombia to the U.S.?	17:47:45

19	MR. RAYMOND: I object to the	17:47:46
20	form of the question. You never	17:47:48
21	asked him that question before, so	17:47:49
22	the implication that he's answered	17:47:50
23	it one way or the other is not	17:47:52
24	correct. But you can ask him the	17:47:54
25	question if you'd like to.	17:47:55

1 HERNANDO RAMOS MORENO

2 A. It's my understanding that the 17:48:32
3 restriction to export is on cow meat, not 17:48:34
4 poultry or pork, and that's the 17:48:39
5 limitation that we have for exporting to 17:48:41
6 other countries. 17:48:43

7 Q. Did you ever retain -- did you 17:48:46
8 ever obtain the registration of the 17:48:50
9 product which you said you would get next 17:48:52
10 week? 17:48:54

11 A. This email is referring to the 17:49:13
12 registration for the manufacturing plant 17:49:24
13 registration, not the product. So we did 17:49:28
14 get the registration for the 17:49:30
15 manufacturing plant. And the product 17:49:32
16 registration was in process. 17:49:33

17 Q. Do you know if the 17:49:36
18 foot-and-mouth disease is limited to 17:49:37
19 cows? 17:49:41

20 A. Yes. 17:49:48

21 Q. So as far as you know, the 17:49:52
22 foot-and-mouth disease does not effect 17:49:54
23 pigs. Is that correct? 17:49:58

24 A. No. 17:50:04

25 Q. Well, if you come -- if you 17:50:08

1 HERNANDO RAMOS MORENO

2 change your mind about that, I hope 17:50:13

3 you'll indicate that at some point, 17:50:15

4 because I think you're wrong. 17:50:18

5 MR. RAYMOND: I object to the 17:50:24

6 statement. He's not here to 17:50:24

7 testify about such regulations in 17:50:27

8 any event. 17:50:29

9 MR. INGBER: He just did. 17:50:29

10 I'd like to have this marked 17:51:01

11 as Exhibit HRM-J. 17:51:03

12 (Exhibit HRM-J for 17:51:03

13 identification, email dated June 5, 17:51:03

14 2014, with attachment, production 17:51:03

15 numbers IAZ_DNJ 3621 through 17:51:03

16 IAZ_DNJ 3622.) 17:51:40

17 BY MR. INGBER: 17:51:40

18 Q. These are exhibits labeled IAZ 17:51:40

19 3621 through 3622 with some Google 17:51:44

20 translations. 17:51:47

21 So the email that's on 3621 is 17:51:49

22 a, appears to be a June 5, 2014 email 17:51:57

23 from you to Libia Eugenia Bentacur 17:52:02

24 Rendon, and Mr. Arango is copied in. And 17:52:10

25 this is regarding RM Sofia Express. 17:52:16

1 HERNANDO RAMOS MORENO

2 What is this email about? 17:52:22

3 A. It's a request from Luis 17:53:21

4 Alfonso Arango from Cordialsa in order to 17:53:25

5 commercialize the Sofia Express products. 17:53:28

6 These are frozen goods. 17:53:30

7 Q. Who is Betancur Rendon? 17:53:31

8 A. A marketing person who worked 17:53:44

9 with Luis Alfonso Salazar -- Luis Ignacio 17:53:46

10 Salazar. 17:53:53

11 Q. Did Mr. Salazar ask you to 17:53:53

12 refer this to Mr. Betancur Rendon? 17:53:55

13 A. She was responsible for frozen 17:54:19

14 goods, and she worked under Salazar's 17:54:22

15 supervision. 17:54:24

16 Q. Did Mr. Arango provide you a 17:54:25

17 list of frozen food that you needed 17:54:30

18 export advice on? 17:54:34

19 A. He was interested in 17:55:24

20 distributing our frozen line products in 17:55:26

21 the United States to people from 17:55:29

22 Colombian origin. So he did not give me 17:55:32

23 any information, he doesn't give me any 17:55:35

24 details of the products in this email. 17:55:37

25 He wanted a catalog of the products 17:55:39

1 HERNANDO RAMOS MORENO

2 first. 17:55:41

3 Q. Did Mr. Betancur Rendon 17:55:42
4 respond? 17:55:47

5 A. Yes. But it's not in this 17:55:54
6 document. 17:56:02

7 Q. What did he say, do you 17:56:02
8 remember? 17:56:50

9 A. That we had a restriction in 17:56:50
10 many of the frozen foods, but that we 17:56:51
11 could distribute ethnic products like the 17:56:55
12 dough for the bumuelos or for the cheese 17:56:57
13 sticks or palitos de queso. It's not 17:57:00
14 really a restriction, it's more of a 17:57:04
15 limitation with frozen food distribution. 17:57:06

16 Q. Were these Zenu-branded 17:57:09
17 products? 17:57:12

18 A. At that time no, but today 17:57:25
19 they became Zenu brand products. They 17:57:27
20 were Sofia Express back then. 17:57:31

21 Q. Did Industria acquire Sofia 17:57:34
22 Express? 17:57:39

23 A. Yes. 17:57:39

24 Q. And what kind of products did 17:57:41
25 Sofia Express make? 17:57:44

1 HERNANDO RAMOS MORENO

2 A. It was frozen foods, like 17:58:04
3 palitos de queso, empanadas, prepared 17:58:21
4 foods like pasta bolognese, dough for 17:58:28
5 bumuelos and pizzas. 17:58:32

6 MR. INGBER: We need to take a 17:59:02
7 short break. Five minutes. 17:59:04

8 (A recess was taken.) 17:59:18

9 (Exhibit HRM-K for 17:59:18
10 identification, email dated 17:59:18
11 November 11, 2014, production 17:59:18
12 numbers IAZ_DNJ 3636 through 17:59:18
13 IAZ_DNJ 3637.) 18:19:59

14 MR. INGBER: We're up to 18:19:59
15 Exhibit K. Which is IAZ_DNJ 3636 18:20:00
16 through 37. 18:20:06

17 BY MR. INGBER: 18:20:12

18 Q. Now, I'd like you to refer to 18:20:13
19 the second email on 3636. Dated, I 18:20:15
20 believe it's dated September 10, 2014. 18:20:25
21 And if you could read that and then I'm 18:20:30
22 going to ask the translator to read that 18:20:32
23 into the record. 18:20:36

24 A. Perfect. 18:20:43

25 MR. INGBER: We don't need 18:20:46

1	HERNANDO RAMOS MORENO	
2	him -- we need you to read it.	18:20:47
3	MR. RAYMOND: Read it to	18:20:49
4	yourself.	18:20:50
5	MR. INGBER: Read it to	18:20:52
6	yourself so you're familiar with	18:20:53
7	it.	18:20:54
8	THE INTERPRETER: Hey	18:20:57
9	Hernando. I am visiting some	18:20:59
10	points of sale here in New Jersey	18:21:00
11	and I am seeing that there are --	18:21:03
12	some Zenu beans are for sale here	18:21:08
13	from a company called Zenu Products	18:21:11
14	USA. The logo, descriptors and	18:21:13
15	photos are identical as the	18:21:19
16	Colombian product. But this is not	18:21:21
17	a Zenu product. It's from a	18:21:25
18	company that it's appropriating the	18:21:28
19	Zenu brand and it makes the	18:21:32
20	consumer feel that he or she is	18:21:33
21	buying Zenu products when they're	18:21:35
22	really not. I visited the website	18:21:37
23	Zenu.US.com/EN, and you can find	18:21:43
24	there -- it's not I visited.	18:21:52
25	Visit. Visit the website -- sorry,	18:21:57

1 HERNANDO RAMOS MORENO

2 it is I visited. And you will find 18:22:07
3 there that they even sell the 18:22:11
4 Ranchera sausage, Zenu chorizo, et 18:22:13
5 cetera. I am attaching a photo 18:22:19
6 that I took at the point of sale 18:22:21
7 and I additionally purchased a 18:22:23
8 sample in case you need it. 18:22:25
9 Additionally, I asked the cashiers 18:22:29
10 about the sale of this product, and 18:22:32
11 coincidentally they were Colombian. 18:22:37
12 And they said that they were very 18:22:39
13 happy that -- that the consumers 18:22:41
14 were very happy because they are 18:22:43
15 seeing that they could now buy Zenu 18:22:45
16 products in the U.S.A. and that the 18:22:50
17 canned beans -- and that it's 18:22:54
18 already a leading brand for the 18:22:57
19 canned beans. I consider this an 18:22:59
20 important subject for you to review 18:23:02
21 internally in the company. 18:23:05

22 BY MR. INGBER: 18:23:23

23 Q. So this is an email from 18:23:23

24 Mr. Arango to you. Is that right? 18:23:26

25 A. Yes. 18:23:33

1 HERNANDO RAMOS MORENO

2 Q. And Mr. Arango I believe is 18:23:36
3 saying in his letter that he saw 18:23:49
4 customers -- excuse me. He asked the 18:23:51
5 cashiers about the sale of this product 18:23:54
6 and the customers were -- excuse me -- 18:23:56
7 the cashiers were Colombian, and they 18:24:03
8 said that they were very happy, the 18:24:06
9 consumers were very happy because they're 18:24:09
10 seeing that they can now buy Zenu 18:24:12
11 products in the U.S. and that the canned 18:24:14
12 beans -- is already a leading brand for 18:24:16
13 the canned beans. 18:24:17

14 Did you share this 18:24:49
15 information, this email with people at 18:24:53
16 Industria? 18:24:55

17 A. I suppose so. 18:25:00

18 Q. Did you discuss it with Diego 18:25:07
19 Medina? 18:25:09

20 A. I don't remember. 18:25:12

21 Q. Do you know that Industria has 18:25:16
22 made some allegations in their complaint 18:25:19
23 that say that the Latinfood goods are 18:25:24
24 subpar and not inspected? 18:25:31

25 A. I don't know the details of 18:25:49

1 HERNANDO RAMOS MORENO

2 that statement. 18:25:56

3 Q. Have you heard that statement 18:25:57
4 before? 18:25:58

5 A. Not the statement. What I did 18:26:16
6 hear or what I know is that these 18:26:21
7 products are not manufactured by 18:26:23
8 Industria de Alimentos Zenu. 18:26:25

9 Q. Did you ever get any emails 18:26:29
10 from Mr. Arango or anybody else that 18:26:30
11 stated that customers were unhappy with 18:26:34
12 Latinfood's Zenu products in the U.S.? 18:26:37

13 A. In detail what Luis Arango was 18:27:58
14 saying is that he saw the products and 18:28:07
15 that visually these products use the 18:28:09
16 Zenu -- the Zenu brand or the Zenu 18:28:15
17 trademark, which is the leading brand of 18:28:17
18 the product in Colombia. So consumers 18:28:20
19 were happy to see their trusted brand, 18:28:23
20 which was not a product that was made by 18:28:26
21 Industria, but it was made by Latinfoods. 18:28:28
22 So consumers wouldn't have the knowledge 18:28:33
23 or they wouldn't know the details for 18:28:34
24 that information and they would just 18:28:36
25 assume that they are Zenu products, which 18:28:38

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